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WAD 6819
8124/07
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August 24, 2007
G-1241-WDE-161

Shawn Blocker
RCRA Corrective Action, AWT-121
U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue
Seattle, Washington 98101

RECEIVED

AUG 27 2007

Office of Air, Waste & Toxics

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Subject: *Characterization of Caulk in Concrete Pavements Interim Measure Work Plan - EPA Comments Section 10.3 Meeting Request*
Boeing Plant 2, Seattle/Tukwila, Washington
EPA ID No. WAD 00925 6819
RCRA Docket No. 1092-01-22-3008(h)

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Dear Mr. Blocker:

Boeing reviewed your letter dated August 14, 2007 on the subject work plan and had need to request a meeting pursuant to Order Section 10.3 to ensure clarity on several points. For the sake of expediency, I believe our phone call yesterday August 23 2007 has largely addressed these points, as I outline below.

In General Comment 1, EPA requests additional characterization and identification of caulk that is visually degraded or eroded. We note that our proposed work plan already specifically includes characterization and identification of caulk in any "weathered" condition, which certainly includes that which is "visually degraded or eroded". We understand on the basis of our call that present wording in our plan satisfies EPA's intent behind this comment.

In Specific Comment 2, EPA requests that "confirmation sampling" of caulk with more than 25 ppm PCBs be included in the Preliminary Report. As we say in Section 5.1, the Preliminary Report in part will present the results of all characterization and sampling work done to identify the PCB content of these caulking products. Additionally, in Sections 3.1 and 3.2.2, we say "Statistical analyses and/or additional sampling may be conducted if needed to increase the level of confidence in the conclusions of this evaluation". We understand on the basis of our call, especially in light of established meanings of the words "confirmation sampling", that present wording in our plan satisfies EPA's intent behind this comment.

We are pleased to have been able to discuss and quickly resolve these few points so as to expedite final approval and implementation of this important activity during dry conditions.

Based on our call I consider these points to be addressed, however, please contact me without delay with any further questions or comments or clarifications you may have on this important matter.



USEPA RCRA



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To: S. Blocker
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Sincerely,



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cc: Hideo Fujita, Department of Ecology (by email)
Brad Helland, Department of Ecology (by email)

